

LAW OFFICES OF JILL R. SHELOW PLLC

15 Chester Avenue
White Plains, NY 10601
jrs@shellowlaw.com
212.792.4911 (Telephone)
203.258.1463 (Mobile)

July 30, 2025

BY ECF AND EMAIL

The Honorable Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601
Gina.Sicora@nysd.uscourts.gov

RE: *United States v. Ramirez*, 25-CR-35 (NSR)

Dear Judge Román:

I am writing to request an adjournment of the status conference in this matter presently scheduled for August 1, 2025 at 12:15 p.m. to prepare motions and continue negotiations for a pretrial disposition.

I have conferred with AUSA Rey Watson and propose the following schedule for Your Honor's consideration: defense motions due on September 19, 2025; Government opposition due October 3, 2025; defense reply (if any) filed by October 20, 2025; and the pretrial conference scheduled for November 21, 2025 at 12 noon when your chambers advises that Your Honor is available. The Government consents to this request, and Mr. Ramirez consents to excluding August 1 to November 21, 2025 from the Speedy Trial Act calculations.

Thank you for your consideration.

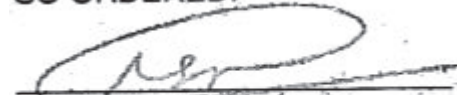
Respectfully submitted,

Jill R. Shellow

cc: Edward Ramirez (by legal mail)
AUSA Rey Watson (by email)

In light of the Defendant intending to file a motion, the agreed upon briefing schedule is as follows: defense motions shall be filed on Sept. 19, 2025; Gov't opposition shall be filed on Oct. 3, 2025; defense reply (if any) shall be filed by Oct. 20, 2025. The parties are directed to provide the Court with two paper courtesy copies and one set by email as the papers are filed. The Aug. 1, 2025 Status Conf is adjourned. A Pretrial Conf. is scheduled for Nov. 21, 2025 at 12 noon. Clerk of Court is requested to terminate the motion at ECF No. 34.
Dated: White Plains, NY
July 30, 2025

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/30/2025

MEMO ENDORSED